

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
)	
Donald Wayne Jackson)	Case No. 13-14184-BFK
)	(Chapter 7)
Debtor)	
_____)	

**TRUSTEE’S MOTION TO APPROVE CONSENT SALE OF REAL
PROPERTY UNDER 11 U.S.C. § 363(h) AND F.R.Bankr.P. 9019(a)**

Klinette H. Kindred, Chapter 7 Trustee, by counsel, hereby moves pursuant to 11 U.S.C. §363 and F.R.Bankr.P. 6004 & 9019 for leave and authority to sell property of the Debtor, with any liens to be paid from proceeds of sale, and states in support thereof the following:

1. Movant is serving as Chapter 7 Trustee in this matter.
2. The Debtor, Donald Wayne Jackson, filed a voluntary petition under Chapter 7 of the Bankruptcy Code on September 13, 2013.
3. Among Mr. Jackson’s assets is a fifty percent (50%) ownership interest in real property, known as 11416 Links Drive, Reston, VA 20190 (hereinafter referred to as the “Property”) owned jointly with his non-debtor ex-spouse Deborah Lynn Jackson.
4. Trustee has obtained the consent of the non-filing co-owner of the Property, as evidenced by the signed Consent order attached hereto as Exhibit 1, to sell the Property.

WHEREFORE, Trustee prays for entry of an Order authorizing the sale of Mr. Jackson’s and the non-filing co-owner Deborah Lynn Jackson’s interest in jointly owned real estate located at 11416 Links Drive, Reston, VA 20190, and for such other and further relief as the Court deems appropriate.

KLINETTE H. KINDRED, TRUSTEE
BY COUNSEL

/s/ Klinette H. Kindred
Klinette H. Kindred, VSB #18000
Tyler, Bartl, Ramsdell & Counts, P.L.C.
300 N. Washington Street, Suite 202
Alexandria, Virginia 22314
(703) 549-5000
Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Trustee's Motion was mailed this 17th day of January, 2014 to the Office of the U.S. Trustee, 115 South Union Street, Suite P210, Alexandria, VA 22314, Nathan A. Fisher, Esquire, 3977 Chain Bridge Road, Suite 2, Fairfax, VA 22030, counsel for debtor and for Deborah Lynn Jackson.

/s/ /s/ Klinette H. Kindred